Case 1:07-cv-11272-RMB

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Filed 01/25/2008 Page 1 of 2 USDC SONY DCCUMANT

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## Law Offices of Green & Lavel

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## Hand Delivery

January 25, 2008

Honorable Richard M. Berman United States District Judge Southern District of New York United States Courthouse 40 Centre Street, Courtroom 706 New York, New York 10007

MEMO ENDORSED

Z 0 ZUUU

Re:

Seneca Insurance Co. v. Illinois National Ins.

Docket No.: 07 CV 11272
Our File No.: NYCV 0395

To the Honorable Richard M. Berman:

This office represents Illinois National Insurance Co. ("Illinois National") in the above-entitled action. This office received this file last week and immediately contacted plaintiff's counsel and secured a stipulation to extend Illinois National's time to answer to February 15, 2008. This stipulation was emailed to the Orders and Judgments Department on Tuesday, January 22, 2008.

This afternoon, this office learned that there was a Pre-Trial Conference scheduled for Monday, January 28, 2008. Due to the fact that we have not received all of the relevant documents and have not yet answered the complaint, we are making an application to adjourn the Pre-Trial Conference to February 19, 2008, at 9:15 a.m.

I have contacted Allen Sheridan, of Saretsky, Katz, Dranoff & Glass, LLP, attorneys for plaintiff, and he has consented to the adjournment. To my knowledge, there have not been any prior requests for an adjournment.

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To the Honorable Richard M. Berman United States District Judge Southern District of New York January 28, 2008 Page 2

If there are any questions or concerns with the foregoing, please contact me at (212) 266-5883.

Respectfully,

Erika C. Aljens

cc: (via telefax)
Allen Sheridan, Esq.
Saretsky, Katz, Dranoff & Glass, LLP
475 Park Avenue South, 26<sup>th</sup> Floor
New York, New York 10016

CONFELENCE AND OVERED TO 2/19/08  AT 9:15 A.M.
SO OPPEDED.
Date: 1/25/08 Richard M. Berman, U.S.D.J.